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August 6, 2018

VIA ECF

The Honorable Henry Pitman
United States Magistrate Judge
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

**Re: *Coventry Capital US LLC v. EEA Life Settlements, Inc., et al.*,
Civil Action No. 1:17-cv-07417-VM-HBP**

Dear Judge Pitman:

I write on behalf of Plaintiff Coventry Capital US LLC (“Coventry Capital”) in response to the August 2, 2018 letter from Hiren Patel and Vincent Piscaer (the “Individual Defendants”) to the Court. The Individual Defendants agree with Coventry Capital’s proposed schedule (since entered by the Court), D.E. 76 (Aug. 2, 2018 Ltr.) at 2, but request that *if* the Court denies Coventry Capital’s pending motions and *if* any appeal from that hypothetical denial is unsuccessful, the Court should order Coventry Capital to depose the Individual Defendants “by no later than November 15, 2018.” D.E. 77 (Aug. 2, 2018 Ltr.) at 1. This request is premised upon layers of conjecture about how and when the Court will rule. If the Court’s ruling on Coventry Capital’s pending motions requires that the schedule be revisited, the parties can do so once a decision has been issued.

We are happy to discuss this further at the August 14, 2018 hearing as needed.

Respectfully submitted,



William P. Ashworth

cc: Counsel of Record